

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC
MDL 2641

Julius Heflin,
Plaintiff,

v.

Civil Action No.: 2:16-cv-04273

C.R. Bard, Incorporated, et al
Defendants,

MOTION FOR LEAVE TO AMEND COMPLAINT

Plaintiff, **JULIUS HEFLIN**, pursuant to the applicable Federal Rule of Civil Procedure 15(a)(2), by and through the undersigned Counsel, hereby seeks to amend the Complaint.

Plaintiff, **JULIUS HEFLIN'S** initial Complaint was filed via CM/ECF on December 7, 2016. Complaint in error did not include the correct filter model: **G2® Express (G2®X) Vena Cava Filter**.

Counsel for Plaintiff has conferred with counsel for Defense who has stated they do not oppose this Motion.

WHEREFOR, Plaintiff, **JULIUS HEFLIN**, respectfully requests that this Court grant Plaintiff's Motion for Leave to Amend Complaint.

Dated: January 11, 2019

Respectfully submitted,

s/Peyton P. Murphy

PEYTON P. MURPHY (LA # 22125)
MURPHY LAW FIRM, LLC
2354 S. Acadian Thruway
Baton Rouge, LA 70808
Telephone: (225) 928-8800
Facsimile: (225) 928-8802
Email: Peyton@MurphyLawFirm.com